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BY ECF

Honorable Paul A. Crotty
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Johnny Hincapie v. City of New York, et al., 18-CV-3432 (PAC)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, attorney for defendants City, Gonzalez, Casey, Christie, Borman, Connolly, Rosario, Rizzo, and Santoro (collectively “defendants”) in the above-referenced matter. I write to respectfully request that Your Honor “so order” the enclosed subpoena directing the New York City Employees’ Retirement System (“NYCERS”) to produce the last known address of retired Sergeant Sheriff Ali, who is named as a defendant in this matter.

Upon information and belief, Sergeant Ali retired from NYPD Transit in or about 1994. NYPD has been unable to locate a last known address or phone number for him. We are advised that NYCERS may have this information but requires a “so-ordered subpoena” to provide any potential information. Accordingly, defendants now respectfully request that Your Honor “so order” the enclosed subpoena directing NYCERS to produce the last known address and phone number of former Sergeant Ali.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

W. KeAupuni Akina
Senior Counsel
Special Federal Litigation Division

To: All counsel of record (via ECF)